








[skip to main content](#)[Print](#)**CASE INFORMATION****CV-20-937000 MICHAEL SHIELDS vs. SMC CORPORATION OF AMERICA, ET AL.****Docket Information**

Filing Date	Docket Party	Docket Type	Docket Description	View Image
10/07/2020	N/A	SR	USPS RECEIPT NO. 42599423 DELIVERED BY USPS 09/28/2020 SMC CORPORATION OF AMERICA PROCESSED BY COC 10/07/2020.	
10/06/2020	N/A	JE	DEFENDANTS' CONSENTED MOTION FOR ENLARGEMENT OF TIME, FILED 10/05/2020, IS GRANTED. DEFENDANTS SHALL MOVE, ANSWER, OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT ON OR BEFORE 11/12/2020. CMC BY PHONE SET FOR 11/17/2020 AT 10:45 AM. PLAINTIFF'S COUNSEL SHALL INITIATE THE CONFERENCE CALL WITH ALL OTHER PARTIES AND CONTACT THE COURT AT THE SET TIME. THE COURT'S STAFF ATTORNEY CAN BE REACHED AT (216) 443-8619. PARTIES SHALL BE PREPARED TO DISCUSS DISCOVERY PROGRESS AND SCHEDULING MATTERS, ETC. NOTICE ISSUED	
10/05/2020	D	MO	MOTION FOR EXTENSION OF TIME DEFENDANTS' CONSENTED MOTION FOR ENLARGEMENT OF TIME 10/06/2020 - GRANTED	
10/01/2020	D	NT	NOTICE OF APPEARANCE, FILED DEFENDANT(S) SMC CORPORATION OF AMERICA(D1) and ERIC LUNDGREN(D2) GREGORY GUERVARA 0067269. APPEARANCE	
09/23/2020	N/A	SR	USPS RECEIPT NO. 42510792 DELIVERED BY USPS 09/14/2020 LUNDGREN/ERIC/ PROCESSED BY COC 09/23/2020.	
09/22/2020	D1	SR	CERTIFIED MAIL RECEIPT NO. 42510791 RETURNED 09/22/2020 FAILURE OF SERVICE ON DEFENDANT SMC CORPORATION OF AMERICA - ATTEMPTED NOT KNOWN NOTICE MAILED TO PLAINTIFF(S) ATTORNEY	
09/21/2020	N/A	SR	SUMMONS E-FILE COPY COST	
09/21/2020	D1	CS	WRIT FEE	
09/21/2020	D1	SR	SUMS COMPLAINT(42599423) SENT BY CERTIFIED MAIL. TO: SMC CORPORATION OF AMERICA 10100 SMC BLVD NOBLESVILLE, IN 46060-0000	
09/21/2020	P1	SR	PRAECIPE FILED SECOND AMENDED INSTRUCTIONS FOR SERVICE	
09/20/2020	N/A	SR	CERTIFIED MAIL RECEIPT NO. 42557682 RETURNED 9/19/2020 FAILURE OF SERVICE ON DEFENDANT SMC CORPORATION OF AMERICA - ATTEMPTED NOT KNOWN NOTICE MAILED TO PLAINTIFF(S) ATTORNEY	
09/15/2020	N/A	SR	SUMMONS E-FILE COPY COST	
09/15/2020	D1	CS	WRIT FEE	
09/15/2020	D1	SR	SUMS COMPLAINT(42557682) SENT BY CERTIFIED MAIL. TO: SMC CORPORATION OF AMERICA C/O CT CORPORATION SYSTEM, ITS SA 36 PENNSYLVANIA STREET INDIANAPOLIS, IN 46204-0000	
09/15/2020	P1	SR	PRAECIPE FILED AMENDED INSTRUCTIONS FOR SERVICE OF COMPLAINT	
09/15/2020	N/A	SR	CERTIFIED MAIL RECEIPT NO. 42510791 RETURNED 9/14/2020 FAILURE OF SERVICE ON DEFENDANT SMC CORPORATION OF AMERICA - OTHER REASON NOTICE MAILED TO PLAINTIFF(S) ATTORNEY	
09/09/2020	N/A	SR	SUMMONS E-FILE COPY COST	
09/09/2020	N/A	SR	SUMMONS E-FILE COPY COST	
09/09/2020	D2	CS	WRIT FEE	
09/09/2020	D2	SR	SUMS COMPLAINT(42510792) SENT BY CERTIFIED MAIL. TO: ERIC LUNDGREN 6541 CITY WEST PARKWAY EDEN PRAIRIE, MN 55344	
09/09/2020	D1	CS	WRIT FEE	
09/09/2020	D1	SR	SUMS COMPLAINT(42510791) SENT BY CERTIFIED MAIL. TO: SMC CORPORATION OF AMERICA 36 PENNSYLVANIA STREET INDIANAPOLIS, IN 46204	
09/09/2020	N/A	SF	JUDGE DANIEL GAUL ASSIGNED (RANDOM)	

09/09/2020	P1	SF	LEGAL RESEARCH
09/09/2020	P1	SF	LEGAL NEWS
09/09/2020	P1	SF	LEGAL AID
09/09/2020	P1	SF	COURT SPECIAL PROJECTS FUND
09/09/2020	P1	SF	COMPUTER FEE
09/09/2020	P1	SF	CLERK'S FEE
09/09/2020	P1	SF	DEPOSIT AMOUNT PAID J. MICHAEL MURRAY
09/09/2020	N/A	SF	CASE FILED: COMPLAINT, SERVICE REQUEST



Only the official court records available from the Cuyahoga County Clerk of Courts, available in person, should be relied upon as accurate and current.

Website Questions or Comments.

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**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**New Case Electronically Filed: COMPLAINT**  
**September 9, 2020 12:38**

By: J. MICHAEL MURRAY 0019626

Confirmation Nbr. 2068446

MICHAEL SHIELDS

CV 20 937000

vs.

Judge: DANIEL GAUL

SMC CORPORATION OF AMERICA, ET AL.

Pages Filed: 6

**IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO**

**MICHAEL SHIELDS**  
23334 S. Melrose Dr.  
Westlake, Ohio 44145

Plaintiff,

vs.

**SMC CORPORATION OF AMERICA**  
c/o CT, its Statutory Agent  
36 Pennsylvania St.  
Indianapolis, Indiana 46204

and

**ERIC LUNDGREN**  
SMC Corp. of America, Minneapolis Branch  
6541 City West Parkway Eden  
Prairie, MN 55344

Defendants.

CASE NO.:

JUDGE:

**COMPLAINT**

*(JURY DEMAND ENDORSED HEREON)*

**INTRODUCTION**

1. This is an age discrimination action arising from Defendants' unlawful termination of Plaintiff's employment on April 10, 2020. This action is being brought pursuant to R.C. §4112.02(L).

**PARTIES**

2. Plaintiff Michael Shields is 67 years old. Until April 10, 2020, Plaintiff was employed as a Corporate Account Manager in the Cleveland branch of Defendant SMC Corporation of America. Plaintiff was an employee as defined by § 4112.01(A)(3), Ohio Rev. Code.

3. Defendant SMC Corporation of America (“SMC”) is a for-profit corporation with its principal place of business located at 10100 SMC Boulevard, Noblesville, IN, 46060. Defendant SMC is an employer as defined by § 4112.01(A)(2), Ohio Rev. Code.
4. Defendant Eric Lundren is an individual and a resident of the State of Minnesota. Defendant Lundgren is employed as a Regional Sales Manager by Defendant SMC and is also an employer as defined by § 4112.01(A)(2), Ohio Rev. Code.

#### **JURISDICTION AND VENUE**

5. Defendants transact business in this state and caused injury to Plaintiff in this state. This Court has personal jurisdiction over Defendants based on, but not limited to, Ohio’s Long Arm Statute, R.C. § 2307.382(A)(1),(3),(4) and Ohio R. Civ. P. 4.3(A)(1),(3),(4).
6. Plaintiff’s claims arose in Cuyahoga County, he resides in Cuyahoga County and Defendants are nonresidents of the State of Ohio. Venue is, therefore, proper in Cuyahoga County.

#### **GENERAL ALLEGATIONS**

7. Defendant SMC is the United States subsidiary of SMC Corporation based in Japan. It provides industries with technology and products to support automation.
8. In 2005, Plaintiff first began his employment with Defendant SMC as an account manager in its Cleveland branch.
9. After six successful years, Plaintiff left Defendant SMC to pursue other opportunities in 2011.
10. Two years later, Plaintiff returned to SMC as an employee. More specifically,

Plaintiff accepted the position of Global Target Account Manager. That position came with more responsibilities than Plaintiff's previous role with the company, and placed a greater emphasis on client interaction and business development.

Plaintiff's Role and Performance

11. In 2017, Defendant SMC designated Plaintiff to serve as one of two Corporate Account Managers for the Cleveland branch.
12. In or around April of 2018, the other Corporate Account Manager left SMC and Plaintiff began to serve as the only Corporate Account Manager for the Cleveland branch.
13. Plaintiff was a loyal employee and performed his duties well for years and continued to be highly qualified for his position.

Defendants' Discriminatory Treatment

14. In or around November of 2019, SMC hired a new employee as another Corporate Account Manager within the Cleveland branch. At that time, the new employee was 34 years old. Plaintiff, on the other hand, was 66 years old and was the oldest employee within the Cleveland branch.
15. On April 10, 2020, three months before his 67<sup>th</sup> birthday, while he was working from home in Westlake, OH, Plaintiff received a phone call from Defendant Eric Lundgren. Defendant Lundgren is a Regional Sales Manager for Defendant SMC and his responsibilities include overseeing the Cleveland branch.
16. Defendant Lundgren informed Plaintiff that he was being terminated immediately as a result of the economic condition of SMC that he attributed to COVID-19.

17. Hours later, two of Defendant SMC's employees went to Plaintiff's home and repossessed his corporate car, cell phone, laptop, gas card and credit card.
18. Defendant SMC offered Plaintiff only one week's severance pay upon his termination. It then presented him with a written release agreement providing that if he agreed to release all claims he had against SMC, it would pay him two weeks severance. Plaintiff declined that offer.
19. Attached to the written release agreement Defendant SMC provided to Plaintiff was a list of employees who were also being terminated as a result of the alleged economic circumstances caused by COVID-19.
20. Of the 28 employees in the Cleveland branch, only Plaintiff, who was the oldest member of the branch, and a Business Development Manager, who, at age 63, was the second oldest person in the Branch, were fired.
21. On the list of employees who were not terminated was the 34 year old Corporate Account Manager, who had been hired just some five months earlier.

**UNLAWFUL AGE DISCRIMINATION IN EMPLOYMENT UNDER R.C. §4112.02**

22. Plaintiff incorporates all previous allegations.
23. Plaintiff was more than 40 years of age at all times relevant to the allegations in this Complaint.
24. Plaintiff was qualified for his position and capable of performing his job duties.
25. Defendants SMC and Lundgren terminated Plaintiff because of his age on April 10, 2020.
26. Defendant SMC and Lundgren assigned the duties that formerly belonged to Plaintiff

to a younger employee or employees.

27. Defendants SMC and Lundgren discriminated against Plaintiff because of his age with respect to the terms, conditions and privileges of his employment, including but not limited to terminating his employment in violation of §§ 4112.02 and 4112.99, Ohio Rev. Code.
28. As a direct and proximate result of the wrongful conduct of Defendants SMC and Lundgren, Plaintiff suffered and will continue to suffer economic and non-economic harms and damages for which Defendants are liable, including but not limited to emotional pain and suffering, humiliation, embarrassment, loss of enjoyment of life and the loss of past and future wages, fringe benefits and other privileges and conditions of employment.
29. Defendants SMC and Lundgren intentionally, willfully, wantonly, recklessly, and maliciously violated Plaintiff's rights under §§ 4112.02 and 4112.99, Ohio Revised Code for which Defendants are liable for punitive damages, attorney's and expert fees, costs, interest, and any equitable relief that this Court deems appropriate.

#### **PRAYER FOR RELIEF**

Plaintiff demands the following relief against Defendants:

1. Judgment in his favor awarding compensatory damages, jointly and severally, in excess of Twenty-Five Thousand Dollars;
2. Judgment in his favor awarding punitive damages, jointly and severally, in excess of Twenty-Five Thousand Dollars;
3. Judgment in his favor awarding him back pay, front pay, prejudgment interest,



reasonable attorneys' and expert fees, and costs, jointly and severally;

4. Such other further legal and equitable relief to which Plaintiff is entitled.

**JURY DEMAND**

Plaintiff demands a trial by jury on all issues within this Complaint.

Respectfully submitted,

/s/ J. Michael Murray

J. MICHAEL MURRAY (0019626)

jmmurray@bgmdlaw.com

WILLIAM C. LIVINGSTON (0089538)

wlivingston@bgmdlaw.com

BERKMAN, GORDON, MURRAY & DEVAN

55 Public Square, Suite 2200

Cleveland, Ohio 44113-1949

Telephone: (216) 781-5245

Facsimile: (216) 781-8207

Attorneys for Plaintiff



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**New Case Electronically Filed: SERVICE REQUEST**  
**September 9, 2020 12:38**

By: J. MICHAEL MURRAY 0019626

Confirmation Nbr. 2068446

MICHAEL SHIELDS

CV 20 937000

vs.

**Judge: DANIEL GAUL**

SMC CORPORATION OF AMERICA, ET AL.

Pages Filed: 1



Common Pleas Court of Cuyahoga County, Ohio  
Nailah K. Byrd, Clerk of Courts

**INSTRUCTIONS FOR SERVICE**

MICHAEL SHIELDS  
Plaintiff(s)

Case Number \_\_\_\_\_

Judge: \_\_\_\_\_

Vs.  
SMC CORPORATION OF AMERICA, ET AL.  
Defendants(s)

Date: September 9, 2020

Method of Service Requested:

Certified Mail Service ☒ Ordinary Mail Service ☐ Federal Express Service ☐

Personal Service by the Sheriff of \_\_\_\_\_ County \_\_\_\_\_

Residence Service by the Sheriff of \_\_\_\_\_ County \_\_\_\_\_

Personal Service By Process Server \_\_\_\_\_

Residence Service by Process Server \_\_\_\_\_

Civ.R. 4.7 Waiver Requested \_\_\_\_\_

Name(s) and Address(es) of Parties to Serve:

<u>SMC CORPORATION OF AMERICA</u>	<u>ERIC LUNDREN</u>
<u>C/O CT, its Statutory Agent</u>	<u>SMC Corp. of America, Minneapolis Branch</u>
<u>36 Pennsylvania St.</u>	<u>6541 City West Parkway Eden</u>
<u>Indianapolis, IN 46204</u>	<u>Prairie, MN 55344</u>

Additional Instructions:

\_\_\_\_\_  
\_\_\_\_\_

Filing Party Name: J. Michael Murray Supreme Court ID if applicable: 0019626

Phone Number: 216-781-5245

*For Use by Sheriff or Process Server Only*

Number of Service Attempts: \_\_\_\_\_

Electronically Filed 09/09/2020 12:38 / CV 20-037000 / Confirmation Nbr. 2068446 / CLAJB

Address for Service if Different from address included above: \_\_\_\_\_

CASE NO.  
CV20937000

D1 CM

SUMMONS NO.  
42510791

Rule 4 (B) Ohio

Rules of Civil  
Procedure

## SUMMONS

MICHAEL SHIELDS  
vs

PLAINTIFF

SMC CORPORATION OF AMERICA, ET AL.

DEFENDANT

SMC CORPORATION OF AMERICA  
C/O CT, ITS STATUTORY AGENT  
36 PENNSYLVANIA STREET  
INDIANAPOLIS IN 46204

You have been named defendant in a sums complaint (copy attached hereto) filed in Cuyahoga County Court of Common Pleas, Cuyahoga County Justice Center, Cleveland, Ohio 44113, by the plaintiff named herein.

You are hereby summoned and required to answer the complaint within 28 days after service of this summons upon you, exclusive of the day of service.

Said answer is required to be served on Plaintiff's Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court within 3 days after service of said answer on plaintiff's attorney.

If you fail to do so, judgment by default will be rendered against you for the relief demanded in the complaint.

Said answer is required to be served on:



Plaintiff's Attorney

WILLIAM LIVINGSTON  
55 PUBLIC SQ. STE. 2200  
  
CLEVELAND, OH 44113-0000

Case has been assigned to Judge:

DANIEL GAUL  
Do not contact judge. Judge's name is given for attorney's reference only.

NAILAH K. BYRD  
Clerk of the Court of Common Pleas



DATE SENT  
Sep 9, 2020

By \_\_\_\_\_  
Deputy

COMPLAINT FILED 09/09/2020



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SEP 22 2020

NAILAH K. BYRD  
1200 Ontario  
Cleveland, OH 44113

Case# CV20937000



SMC CORPORATION OF AMERICA  
C/O CT, ITS STATUTORY AGENT  
36 PENNSYLVANIA STREET  
INDIANAPOLIS IN 46204

NIXIE

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RETURN TO SENDER  
ATTEMPTED - NOT KNOWN  
UNABLE TO FORWARD

BC: 44113161099 \*0785-03606-18-36

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CASE NO.  
CV20937000

D2 CM

SUMMONS NO.  
42510792

Rule 4 (B) Ohio

Rules of Civil  
Procedure

## SUMMONS

MICHAEL SHIELDS  
VS  
SMC CORPORATION OF AMERICA, ET AL.

PLAINTIFF

DEFENDANT

ERIC LUNDGREN  
SMC CORP OF AMERICA, MINNEAPOLIS  
BRANCH  
6541 CITY WEST PARKWAY EDEN  
PRAIRIE MN 55344

You have been named defendant in a sums  
complaint (copy attached hereto) filed in Cuyahoga  
County Court of Common Pleas, Cuyahoga County  
Justice Center, Cleveland, Ohio 44113, by the  
plaintiff named herein.

You are hereby summoned and required to answer  
the complaint within 28 days after service of this  
summons upon you, exclusive of the day of service.

Said answer is required to be served on Plaintiff's  
Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court  
within 3 days after service of said answer on  
plaintiff's attorney.

If you fail to do so, judgment by default will be  
rendered against you for the relief demanded in the  
complaint.

Said answer is required to be served on:



Plaintiff's Attorney

WILLIAM LIVINGSTON  
55 PUBLIC SQ. STE. 2200  
  
CLEVELAND, OH 44113-0000

Case has been assigned to Judge:

DANIEL GAUL  
Do not contact judge. Judge's name is given for  
attorney's reference only.

NAILAH K. BYRD  
Clerk of the Court of Common Pleas



DATE SENT  
Sep 9, 2020

By \_\_\_\_\_  
Deputy

COMPLAINT FILED 09/09/2020






**UNITED STATES**  
**POSTAL SERVICE**

Date Produced: 09/21/2020

CERTIFIED MAIL SOLUTIONS INC.:

The following is the delivery information for Certified Mail™/RRE item number 9314 8001 1300 3540 6578 59. Our records indicate that this item was delivered on 09/14/2020 at 11:00 a.m. in EDEN PRAIRIE, MN 55344. The scanned image of the recipient information is provided below.

Signature of Recipient :

Signature	
Printed Name	404

Address of Recipient :

Delivery Address	C19
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Sincerely,  
United States Postal Service

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CV20937000

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NAILAH K. BYRD  
CUYAHOGA COUNTY CLERK OF COURTS  
1200 Ontario Street  
Cleveland, Ohio 44113

Court of Common Pleas

PRAECIPE  
September 15, 2020 13:43

By: WILLIAM LIVINGSTON 0089538

Confirmation Nbr. 2072998

MICHAEL SHIELDS

CV 20 937000

vs.

Judge: DANIEL GAUL

SMC CORPORATION OF AMERICA, ET AL.

Pages Filed: 8





Common Pleas Court of Cuyahoga County, Ohio  
Nailah K. Byrd, Clerk of Courts

**INSTRUCTIONS FOR SERVICE**

MICHAEL SHIELDS

Plaintiff(s)

Case Number CV-20-937000

Judge: Daniel Gaul

Vs.

SMC CORPORATION OF AMERICA, ET AL.

Date: September 15, 2020

Defendants(s)

Method of Service Requested:

Certified Mail Service ☒ Ordinary Mail Service ☐ Federal Express Service ☐

Personal Service by the Sheriff of \_\_\_\_\_ County \_\_\_\_\_

Residence Service by the Sheriff of \_\_\_\_\_ County \_\_\_\_\_

Personal Service By Process Server \_\_\_\_\_

Residence Service by Process Server \_\_\_\_\_

Civ.R. 4.7 Waiver Requested \_\_\_\_\_

Name(s) and Address(es) of Parties to Serve:

SMC CORPORATION OF AMERICA  
C/O CT Corporation System, its Statutory Agent  
36 S. Pennsylvania St.  
Indianapolis, IN 46204

Additional Instructions:

\_\_\_\_\_  
\_\_\_\_\_

Filing Party Name: J. Michael Murray Supreme Court ID if applicable: 0019626

Phone Number: 216-781-5245

*For Use by Sheriff or Process Server Only*

Number of Service Attempts: \_\_\_\_\_

Address for Service if Different from address included above: \_\_\_\_\_



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**New Case Electronically Filed: COMPLAINT**  
**September 9, 2020 12:38**

**By: J. MICHAEL MURRAY 0019626**

Confirmation Nbr. 2068446

MICHAEL SHIELDS

CV 20 937000

vs.

**Judge: DANIEL GAUL**

SMC CORPORATION OF AMERICA, ET AL.

Pages Filed: 6

**IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO**

**MICHAEL SHIELDS**  
23334 S. Melrose Dr.  
Westlake, Ohio 44145

Plaintiff,

vs.

**SMC CORPORATION OF AMERICA**  
c/o CT, its Statutory Agent  
36 Pennsylvania St.  
Indianapolis, Indiana 46204

and

**ERIC LUNDGREN**  
SMC Corp. of America, Minneapolis Branch  
6541 City West Parkway Eden  
Prairie, MN 55344

Defendants.

CASE NO.:

JUDGE:

**COMPLAINT**

*(JURY DEMAND ENDORSED HEREON)*

**INTRODUCTION**

1. This is an age discrimination action arising from Defendants' unlawful termination of Plaintiff's employment on April 10, 2020. This action is being brought pursuant to R.C. §4112.02(L).

**PARTIES**

2. Plaintiff Michael Shields is 67 years old. Until April 10, 2020, Plaintiff was employed as a Corporate Account Manager in the Cleveland branch of Defendant SMC Corporation of America. Plaintiff was an employee as defined by § 4112.01(A)(3), Ohio Rev. Code.

3. Defendant SMC Corporation of America ("SMC") is a for-profit corporation with its principal place of business located at 10100 SMC Boulevard, Noblesville, IN, 46060. Defendant SMC is an employer as defined by § 4112.01(A)(2), Ohio Rev. Code.
4. Defendant Eric Lundgren is an individual and a resident of the State of Minnesota. Defendant Lundgren is employed as a Regional Sales Manager by Defendant SMC and is also an employer as defined by § 4112.01(A)(2), Ohio Rev. Code.

#### **JURISDICTION AND VENUE**

5. Defendants transact business in this state and caused injury to Plaintiff in this state. This Court has personal jurisdiction over Defendants based on, but not limited to, Ohio's Long Arm Statute, R.C. § 2307.382(A)(1),(3),(4) and Ohio R. Civ. P. 4.3(A)(1),(3),(4).
6. Plaintiff's claims arose in Cuyahoga County, he resides in Cuyahoga County and Defendants are nonresidents of the State of Ohio. Venue is, therefore, proper in Cuyahoga County.

#### **GENERAL ALLEGATIONS**

7. Defendant SMC is the United States subsidiary of SMC Corporation based in Japan. It provides industries with technology and products to support automation.
8. In 2005, Plaintiff first began his employment with Defendant SMC as an account manager in its Cleveland branch.
9. After six successful years, Plaintiff left Defendant SMC to pursue other opportunities in 2011.
10. Two years later, Plaintiff returned to SMC as an employee. More specifically,

Plaintiff accepted the position of Global Target Account Manager. That position came with more responsibilities than Plaintiff's previous role with the company, and placed a greater emphasis on client interaction and business development.

Plaintiff's Role and Performance

11. In 2017, Defendant SMC designated Plaintiff to serve as one of two Corporate Account Managers for the Cleveland branch.
12. In or around April of 2018, the other Corporate Account Manager left SMC and Plaintiff began to serve as the only Corporate Account Manager for the Cleveland branch.
13. Plaintiff was a loyal employee and performed his duties well for years and continued to be highly qualified for his position.

Defendants' Discriminatory Treatment

14. In or around November of 2019, SMC hired a new employee as another Corporate Account Manager within the Cleveland branch. At that time, the new employee was 34 years old. Plaintiff, on the other hand, was 66 years old and was the oldest employee within the Cleveland branch.
15. On April 10, 2020, three months before his 67<sup>th</sup> birthday, while he was working from home in Westlake, OH, Plaintiff received a phone call from Defendant Eric Lundgren. Defendant Lundgren is a Regional Sales Manager for Defendant SMC and his responsibilities include overseeing the Cleveland branch.
16. Defendant Lundgren informed Plaintiff that he was being terminated immediately as a result of the economic condition of SMC that he attributed to COVID-19.

17. Hours later, two of Defendant SMC's employees went to Plaintiff's home and repossessed his corporate car, cell phone, laptop, gas card and credit card.
18. Defendant SMC offered Plaintiff only one week's severance pay upon his termination. It then presented him with a written release agreement providing that if he agreed to release all claims he had against SMC, it would pay him two weeks severance. Plaintiff declined that offer.
19. Attached to the written release agreement Defendant SMC provided to Plaintiff was a list of employees who were also being terminated as a result of the alleged economic circumstances caused by COVID-19.
20. Of the 28 employees in the Cleveland branch, only Plaintiff, who was the oldest member of the branch, and a Business Development Manager, who, at age 63, was the second oldest person in the Branch, were fired.
21. On the list of employees who were not terminated was the 34 year old Corporate Account Manager, who had been hired just some five months earlier.

**UNLAWFUL AGE DISCRIMINATION IN EMPLOYMENT UNDER R.C. §4112.02**

22. Plaintiff incorporates all previous allegations.
23. Plaintiff was more than 40 years of age at all times relevant to the allegations in this Complaint.
24. Plaintiff was qualified for his position and capable of performing his job duties.
25. Defendants SMC and Lundgren terminated Plaintiff because of his age on April 10, 2020.
26. Defendant SMC and Lundgren assigned the duties that formerly belonged to Plaintiff

to a younger employee or employees.

27. Defendants SMC and Lundgren discriminated against Plaintiff because of his age with respect to the terms, conditions and privileges of his employment, including but not limited to terminating his employment in violation of §§ 4112.02 and 4112.99, Ohio Rev. Code.
28. As a direct and proximate result of the wrongful conduct of Defendants SMC and Lundgren, Plaintiff suffered and will continue to suffer economic and non-economic harms and damages for which Defendants are liable, including but not limited to emotional pain and suffering, humiliation, embarrassment, loss of enjoyment of life and the loss of past and future wages, fringe benefits and other privileges and conditions of employment.
29. Defendants SMC and Lundgren intentionally, willfully, wantonly, recklessly, and maliciously violated Plaintiff's rights under §§ 4112.02 and 4112.99, Ohio Revised Code for which Defendants are liable for punitive damages, attorney's and expert fees, costs, interest, and any equitable relief that this Court deems appropriate.

#### **PRAYER FOR RELIEF**

Plaintiff demands the following relief against Defendants:

1. Judgment in his favor awarding compensatory damages, jointly and severally, in excess of Twenty-Five Thousand Dollars;
2. Judgment in his favor awarding punitive damages, jointly and severally, in excess of Twenty-Five Thousand Dollars;
3. Judgment in his favor awarding him back pay, front pay, prejudgment interest,

reasonable attorneys' and expert fees, and costs, jointly and severally;

4. Such other further legal and equitable relief to which Plaintiff is entitled.

**JURY DEMAND**

Plaintiff demands a trial by jury on all issues within this Complaint.

Respectfully submitted,

/s/ J. Michael Murray

J. MICHAEL MURRAY (0019626)

jmmurray@bgmdlaw.com

WILLIAM C. LIVINGSTON (0089538)

wlivingston@bgmdlaw.com

BERKMAN, GORDON, MURRAY & DEVAN

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Cleveland, Ohio 44113-1949

Telephone: (216) 781-5245

Facsimile: (216) 781-8207

Attorneys for Plaintiff



CASE NO.  
CV20937000

D1 CM

SUMMONS NO.  
42557682

Rule 4 (B) Ohio

Rules of Civil  
Procedure

## SUMMONS

MICHAEL SHIELDS  
vs

PLAINTIFF

SMC CORPORATION OF AMERICA, ET AL.

DEFENDANT

SMC CORPORATION OF AMERICA  
C/O CT, ITS STATUTORY AGENT  
C/O CT CORPORATION SYSTEM, ITS SA  
36 PENNSYLVANIA STREET  
INDIANAPOLIS IN 46204-0000

Said answer is required to be served on:

Plaintiff's Attorney

WILLIAM LIVINGSTON  
55 PUBLIC SQ. STE. 2200  
CLEVELAND, OH 44113-0000

Case has been assigned to Judge:

DANIEL GAUL  
Do not contact judge. Judge's name is given for  
attorney's reference only.

DATE SENT  
Sep 15, 2020

NAILAH K. BYRD  
Clerk of the Court of Common Pleas

By \_\_\_\_\_  
Deputy



COMPLAINT FILED 09/09/2020

You have been named defendant in a sums  
complaint (copy attached hereto) filed in Cuyahoga  
County Court of Common Pleas, Cuyahoga County  
Justice Center, Cleveland, Ohio 44113, by the  
plaintiff named herein.

You are hereby summoned and required to answer  
the complaint within 28 days after service of this  
summons upon you, exclusive of the day of service.

Said answer is required to be served on Plaintiff's  
Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court  
within 3 days after service of said answer on  
plaintiff's attorney.

If you fail to do so, judgment by default will be  
rendered against you for the relief demanded in the  
complaint.



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NAILAH K. BYRD  
1200 Ontario  
Cleveland, OH 44113

Case# CV20937000

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SMC CORPORATION OF AMERICA  
C/O CT, ITS STATUTORY AGENT  
C/O CT CORPORATION SYSTEM, ITS SA  
36 PENNSYLVANIA STREET  
INDIANAPOLIS IN 46204

SEP 25 2020

NIXIE 452 PE 1049 0909/21/20

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**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**PRAECIPE**  
**September 21, 2020 10:06**

**By: WILLIAM LIVINGSTON 0089538**

**Confirmation Nbr. 2076858**

**MICHAEL SHIELDS**

**CV 20 937000**

**vs.**

**Judge: DANIEL GAUL**

**SMC CORPORATION OF AMERICA, ET AL.**

**Pages Filed: 1**



Common Pleas Court of Cuyahoga County, Ohio  
Nailah K. Byrd, Clerk of Courts

**INSTRUCTIONS FOR SERVICE**

MICHAEL SHIELDS

Plaintiff(s)

Case Number CV-20-937000

Judge: Daniel Gaul

Vs.

SMC CORPORATION OF AMERICA, ET AL.

Date: September 21, 2020

Defendants(s)

Method of Service Requested:

Certified Mail Service ☒ Ordinary Mail Service ☐ Federal Express Service ☐

Personal Service by the Sheriff of \_\_\_\_\_ County \_\_\_\_

Residence Service by the Sheriff of \_\_\_\_\_ County \_\_\_\_

Personal Service By Process Server \_\_\_\_\_

Residence Service by Process Server \_\_\_\_\_

Civ.R. 4.7 Waiver Requested \_\_\_\_\_

Name(s) and Address(es) of Parties to Serve:

SMC CORPORATION OF AMERICA

10100 SMC Blvd

Noblesville, IN 46060

Additional Instructions:

\_\_\_\_\_  
\_\_\_\_\_

Filing Party Name: J. Michael Murray Supreme Court ID if applicable: 0019626

Phone Number: 216-781-5245

*For Use by Sheriff or Process Server Only*

Number of Service Attempts: \_\_\_\_\_

Electronically Filed 09/21/2020 10:06 / SERVICE / CV-20-937000 / Confirmation Nbr. 2076858 / CLBB1

Address for Service if Different from address included above: \_\_\_\_\_



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**PRAECIPE**  
**September 21, 2020 10:06**

By: WILLIAM LIVINGSTON 0089538

Confirmation Nbr. 2076858

MICHAEL SHIELDS

CV 20 937000

vs.

**Judge: DANIEL GAUL**

SMC CORPORATION OF AMERICA, ET AL.

**Pages Filed: 7**



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**New Case Electronically Filed: COMPLAINT**  
**September 9, 2020 12:38**

By: J. MICHAEL MURRAY 0019626

Confirmation Nbr. 2068446

MICHAEL SHIELDS

CV 20 937000

vs.

**Judge: DANIEL GAUL**

SMC CORPORATION OF AMERICA, ET AL.

Pages Filed: 6

**IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO**

**MICHAEL SHIELDS**  
23334 S. Melrose Dr.  
Westlake, Ohio 44145

Plaintiff,

vs.

**SMC CORPORATION OF AMERICA**  
c/o CT, its Statutory Agent  
36 Pennsylvania St.  
Indianapolis, Indiana 46204

and

**ERIC LUNDGREN**  
SMC Corp. of America, Minneapolis Branch  
6541 City West Parkway Eden  
Prairie, MN 55344

Defendants.

CASE NO.:

JUDGE:

**COMPLAINT**

*(JURY DEMAND ENDORSED HEREON)*

**INTRODUCTION**

1. This is an age discrimination action arising from Defendants' unlawful termination of Plaintiff's employment on April 10, 2020. This action is being brought pursuant to R.C. §4112.02(L).

**PARTIES**

2. Plaintiff Michael Shields is 67 years old. Until April 10, 2020, Plaintiff was employed as a Corporate Account Manager in the Cleveland branch of Defendant SMC Corporation of America. Plaintiff was an employee as defined by § 4112.01(A)(3), Ohio Rev. Code.

3. Defendant SMC Corporation of America (“SMC”) is a for-profit corporation with its principal place of business located at 10100 SMC Boulevard, Noblesville, IN, 46060. Defendant SMC is an employer as defined by § 4112.01(A)(2), Ohio Rev. Code.
4. Defendant Eric Lundren is an individual and a resident of the State of Minnesota. Defendant Lundgren is employed as a Regional Sales Manager by Defendant SMC and is also an employer as defined by § 4112.01(A)(2), Ohio Rev. Code.

### **JURISDICTION AND VENUE**

5. Defendants transact business in this state and caused injury to Plaintiff in this state. This Court has personal jurisdiction over Defendants based on, but not limited to, Ohio’s Long Arm Statute, R.C. § 2307.382(A)(1),(3),(4) and Ohio R. Civ. P. 4.3(A)(1),(3),(4).
6. Plaintiff’s claims arose in Cuyahoga County, he resides in Cuyahoga County and Defendants are nonresidents of the State of Ohio. Venue is, therefore, proper in Cuyahoga County.

### **GENERAL ALLEGATIONS**

7. Defendant SMC is the United States subsidiary of SMC Corporation based in Japan. It provides industries with technology and products to support automation.
8. In 2005, Plaintiff first began his employment with Defendant SMC as an account manager in its Cleveland branch.
9. After six successful years, Plaintiff left Defendant SMC to pursue other opportunities in 2011.
10. Two years later, Plaintiff returned to SMC as an employee. More specifically,



Plaintiff accepted the position of Global Target Account Manager. That position came with more responsibilities than Plaintiff's previous role with the company, and placed a greater emphasis on client interaction and business development.

Plaintiff's Role and Performance

11. In 2017, Defendant SMC designated Plaintiff to serve as one of two Corporate Account Managers for the Cleveland branch.
12. In or around April of 2018, the other Corporate Account Manager left SMC and Plaintiff began to serve as the only Corporate Account Manager for the Cleveland branch.
13. Plaintiff was a loyal employee and performed his duties well for years and continued to be highly qualified for his position.

Defendants' Discriminatory Treatment

14. In or around November of 2019, SMC hired a new employee as another Corporate Account Manager within the Cleveland branch. At that time, the new employee was 34 years old. Plaintiff, on the other hand, was 66 years old and was the oldest employee within the Cleveland branch.
15. On April 10, 2020, three months before his 67<sup>th</sup> birthday, while he was working from home in Westlake, OH, Plaintiff received a phone call from Defendant Eric Lundgren. Defendant Lundgren is a Regional Sales Manager for Defendant SMC and his responsibilities include overseeing the Cleveland branch.
16. Defendant Lundgren informed Plaintiff that he was being terminated immediately as a result of the economic condition of SMC that he attributed to COVID-19.

17. Hours later, two of Defendant SMC's employees went to Plaintiff's home and repossessed his corporate car, cell phone, laptop, gas card and credit card.
18. Defendant SMC offered Plaintiff only one week's severance pay upon his termination. It then presented him with a written release agreement providing that if he agreed to release all claims he had against SMC, it would pay him two weeks severance. Plaintiff declined that offer.
19. Attached to the written release agreement Defendant SMC provided to Plaintiff was a list of employees who were also being terminated as a result of the alleged economic circumstances caused by COVID-19.
20. Of the 28 employees in the Cleveland branch, only Plaintiff, who was the oldest member of the branch, and a Business Development Manager, who, at age 63, was the second oldest person in the Branch, were fired.
21. On the list of employees who were not terminated was the 34 year old Corporate Account Manager, who had been hired just some five months earlier.

## UNLAWFUL AGE DISCRIMINATION IN EMPLOYMENT UNDER R.C. §4112.02

22. Plaintiff incorporates all previous allegations.
23. Plaintiff was more than 40 years of age at all times relevant to the allegations in this Complaint.
24. Plaintiff was qualified for his position and capable of performing his job duties.
25. Defendants SMC and Lundgren terminated Plaintiff because of his age on April 10, 2020.
26. Defendant SMC and Lundgren assigned the duties that formerly belonged to Plaintiff

to a younger employee or employees.

27. Defendants SMC and Lundgren discriminated against Plaintiff because of his age with respect to the terms, conditions and privileges of his employment, including but not limited to terminating his employment in violation of §§ 4112.02 and 4112.99, Ohio Rev. Code.
28. As a direct and proximate result of the wrongful conduct of Defendants SMC and Lundgren, Plaintiff suffered and will continue to suffer economic and non-economic harms and damages for which Defendants are liable, including but not limited to emotional pain and suffering, humiliation, embarrassment, loss of enjoyment of life and the loss of past and future wages, fringe benefits and other privileges and conditions of employment.
29. Defendants SMC and Lundgren intentionally, willfully, wantonly, recklessly, and maliciously violated Plaintiff's rights under §§ 4112.02 and 4112.99, Ohio Revised Code for which Defendants are liable for punitive damages, attorney's and expert fees, costs, interest, and any equitable relief that this Court deems appropriate.

## PRAYER FOR RELIEF

**Plaintiff demands the following relief against Defendants:**

1. Judgment in his favor awarding compensatory damages, jointly and severally, in excess of Twenty-Five Thousand Dollars;
2. Judgment in his favor awarding punitive damages, jointly and severally, in excess of Twenty-Five Thousand Dollars;
3. Judgment in his favor awarding him back pay, front pay, prejudgment interest,

reasonable attorneys' and expert fees, and costs, jointly and severally;

4. Such other further legal and equitable relief to which Plaintiff is entitled.

## JURY DEMAND

Plaintiff demands a trial by jury on all issues within this Complaint.

Respectfully submitted,

/s/ J. Michael Murray  
J. MICHAEL MURRAY (0019626)  
jmmurray@bgmdlaw.com  
WILLIAM C. LIVINGSTON (0089538)  
wlivingston@bgmdlaw.com  
BERKMAN, GORDON, MURRAY & DEVAN  
55 Public Square, Suite 2200  
Cleveland, Ohio 44113-1949  
Telephone: (216) 781-5245  
Facsimile: (216) 781-8207

Attorneys for Plaintiff

CASE NO.  
CV20937000

D1 CM

SUMMONS NO.  
42599423

Rule 4 (B) Ohio

Rules of Civil  
Procedure

## SUMMONS

MICHAEL SHIELDS  
vs

PLAINTIFF

SMC CORPORATION OF AMERICA, ET AL.

DEFENDANT

SMC CORPORATION OF AMERICA  
C/O CT, ITS STATUTORY AGENT  
10100 SMC BLVD  
NOBLESVILLE IN 46060-0000

You have been named defendant in a sums  
complaint (copy attached hereto) filed in Cuyahoga  
County Court of Common Pleas, Cuyahoga County  
Justice Center, Cleveland, Ohio 44113, by the  
plaintiff named herein.

You are hereby summoned and required to answer  
the complaint within 28 days after service of this  
summons upon you, exclusive of the day of service.

Said answer is required to be served on Plaintiff's  
Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court  
within 3 days after service of said answer on  
plaintiff's attorney.

If you fail to do so, judgment by default will be  
rendered against you for the relief demanded in the  
complaint.

Said answer is required to be served on:

Plaintiff's Attorney

WILLIAM LIVINGSTON  
55 PUBLIC SQ. STE. 2200  
  
CLEVELAND, OH 44113-0000

Case has been assigned to Judge:

DANIEL GAUL  
Do not contact judge. Judge's name is given for  
attorney's reference only.

NAILAH K. BYRD  
Clerk of the Court of Common Pleas

*Betty M. Bryant*

By \_\_\_\_\_

Deputy



DATE SENT  
Sep '21, 2020

COMPLAINT FILED 09/09/2020





Date Produced: 10/05/2020

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**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**NOTICE OF APPEARANCE**  
October 1, 2020 15:03

By: GREGORY GUERVARA 0067269

Confirmation Nbr. 2085746

MICHAEL SHIELDS

CV 20 937000

vs.

**Judge: DANIEL GAUL**

SMC CORPORATION OF AMERICA, ET AL.

**Pages Filed: 2**

IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO

MICHAEL SHIELDS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. CV20937000
	)	
SMC CORPORATION OF AMERICA	)	
and ERIC LUNDGREN,	)	
	)	
Defendants.	)	

APPEARANCE

To the Clerk of this Court and all parties of record:

Please enter my appearance as counsel in this case for **Defendants, SMC Corporation of America and Eric Lundgren.**

I certify that I am admitted to practice in this Court.

September 29, 2020

/s/ Gregory W. Guevara

Gregory W. Guevara (IN #16728-49)  
BOSE McKINNEY & EVANS LLP  
111 Monument Circle, Suite 2700  
Indianapolis, IN 46204  
(317) 684-5000; (317) 684-5173 Fax  
GGuevara@boselaw.com

*Attorney for Defendants, SMC Corporation of  
America and Eric Lundgren*



**CERTIFICATE OF SERVICE**

I hereby certify that on September 29, 2020, a copy of the foregoing “Appearance” was filed electronically. Notice of this filing will be sent to the following counsel by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

J. Michael Murray, Esq.  
William C. Livingston, Esq.  
Berkman, Gordon, Murray & Devan  
55 Public Square, Suite 2200  
Cleveland, OH 44113-1949  
[jmmurray@bgmdlaw.com](mailto:jmmurray@bgmdlaw.com)  
[wlivingston@bgmdlaw.com](mailto:wlivingston@bgmdlaw.com)

/s/ Gregory W. Guevara

Gregory W. Guevara

3935119

Motion No. 4890253



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**MOTION FOR EXTENSION OF TIME**  
**October 5, 2020 11:50**

By: GREGORY GUERVARA 0067269

Confirmation Nbr. 2087299

MICHAEL SHIELDS

CV 20 937000

vs.

**Judge: DANIEL GAUL**

SMC CORPORATION OF AMERICA, ET AL.

**Pages Filed: 2**

IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO

MICHAEL SHIELDS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. CV20937000
	)	
SMC CORPORATION OF AMERICA	)	
and ERIC LUNDGREN,	)	
	)	
Defendants.	)	

**DEFENDANTS' CONSENTED MOTION FOR ENLARGEMENT OF TIME**

Pursuant to Rule 8.0(C) of the Cuyahoga County Common Pleas Court Local Rules, Defendants, SMC Corporation of America and Eric Lundgren, by counsel, respectfully move the Court for a 30-day enlargement of time to file an answer or other response to the Complaint filed by Plaintiff, Michael Shields. In support of this motion, Defendants state:

1. Plaintiff initiated this action with the filing of his Complaint on September 9, 2020.
2. Defendants were served with the summons and Complaint on September 15, 2020, resulting in a deadline for Defendants to answer or otherwise respond to the Complaint by October 13, 2020, which time has not yet expired.
3. Defendants reasonably require additional time to investigate and respond to the allegations in the Complaint.
4. No prior enlargements of time have been requested by or granted to Defendants.
5. On October 5, 2020, counsel for Defendants contacted counsel for Plaintiff, to request consent to the enlargement of time which is the subject of this motion. Plaintiff consents to the enlargement of time.

6. This motion is not made for purposes of unnecessary delay or other improper purpose.

WHEREFORE, Defendants, SMC Corporation of America and Eric Lundgren, by counsel, respectfully request that the Court grant Defendants a 30-day enlargement of time, to and including November 12, 2020, in which to answer or otherwise respond to Plaintiff's Complaint and for all other appropriate relief.

Respectfully submitted,

/s/ Gregory W. Guevara

Gregory W. Guevara (OH #0067269)  
BOSE McKINNEY & EVANS LLP  
111 Monument Circle, Suite 2700  
Indianapolis, IN 46204  
(317) 684-5000; (317) 684-5173 Fax  
[GGuevara@boselaw.com](mailto:GGuevara@boselaw.com)

*Attorney for Defendants, SMC Corporation of  
America and Eric Lundgren*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2020, a copy of the foregoing "Defendants' Consented Motion for Enlargement of Time" was filed electronically. Notice of this filing will be sent to the following counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

J. Michael Murray, Esq.  
William C. Livingston, Esq.  
Berkman, Gordon, Murray & Devan  
55 Public Square, Suite 2200  
Cleveland, OH 44113-1949  
[jmmurray@bgmdlaw.com](mailto:jmmurray@bgmdlaw.com)  
[wlivingston@bgmdlaw.com](mailto:wlivingston@bgmdlaw.com)

/s/ Gregory W. Guevara

Gregory W. Guevara

3938807



114664855

**IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO**

**MICHAEL SHIELDS**  
Plaintiff

**SMC CORPORATION OF AMERICA, ET AL.**  
Defendant

Case No: CV-20-937000

Judge: DANIEL GAUL

**JOURNAL ENTRY**

DEFENDANTS' CONSENTED MOTION FOR ENLARGEMENT OF TIME, FILED 10/05/2020, IS GRANTED. DEFENDANTS SHALL MOVE, ANSWER, OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT ON OR BEFORE 11/12/2020.

CMC BY PHONE SET FOR 11/17/2020 AT 10:45 AM. PLAINTIFF'S COUNSEL SHALL INITIATE THE CONFERENCE CALL WITH ALL OTHER PARTIES AND CONTACT THE COURT AT THE SET TIME. THE COURT'S STAFF ATTORNEY CAN BE REACHED AT (216) 443-8619. PARTIES SHALL BE PREPARED TO DISCUSS DISCOVERY PROGRESS AND SCHEDULING MATTERS, ETC.

Judge Signature

10/06/2020

10/05/2020

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10/06/2020 17:02:35  
NAILAH K. BYRD, CLERK